

PHILLIP A. TALBERT
United States Attorney
JUSTIN L. LEE
Assistant U.S. Attorney
501 I Street, Suite 10-100
Sacramento, CA 95814
(916) 554-2700

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	2:24-MJ-0089-CKD
)	
Plaintiff,)	STIPULATION AND ORDER
)	CONTINUING PRELIMINARY
v.)	HEARING DATE
)	
DARRELL DANIEL,)	
)	Judge: Hon. Jeremy D. Peterson
Defendant.)	
)	
)	
)	

STIPULATION

The United States, by and through its undersigned counsel, and the defendant, by and through his counsel of record, hereby stipulate as follows:

1. By prior order, this matter was set for Preliminary Hearing on August 29, 2024.
2. By this Stipulation, the parties now move to continue the Preliminary Hearing until September 20, 2024, at 2:00 p.m.
3. The defendant made his initial appearance on August 8, 2024.
4. The defendant is presently released on pretrial supervision pending trial in this matter.

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5. The United States and the defense have discussed the criminal complaint and whether additional charges will be presented to the grand jury. The United States and the defense have agreed to discuss potential mitigation that may impact the ultimate resolution of this case. Accordingly, the parties need further time to discuss this matter, discuss any potential consequences, and to allow counsel for the defendant reasonable time necessary for preparation and further investigation.
6. The defendant understands that pursuant to 18 U.S.C. § 3161(b), “any information or indictment charging an individual with the commission of an offense shall be filed within thirty days from the date on which such individual was arrested.” Time may be excluded under the Speedy Trial Act if the Court finds that the ends of justice served by granting such a continuance outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A). The parties jointly move to exclude time within which any indictment or information shall be filed from the date of this order, through and including September 20, 2024, pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv), because failure to do so would “deny counsel for the defendant . . . the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.”
7. Good cause exists under Rule 5.1(d) of the Federal Rules of Criminal Procedure.

IT IS SO STIPULATED.

Dated: August 27, 2024

PHILLIP A. TALBERT
United States Attorney

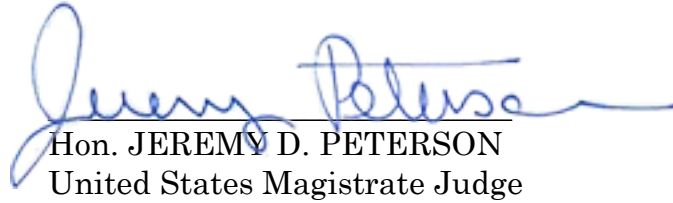
By: /s/ JUSTIN L. LEE
JUSTIN L. LEE
Assistant United States Attorney

Dated: August 27, 2024

By: /s/ MIA CRAGER
MIA CRAGER
Attorney for Defendant
(as authorized on August 27, 2024)

ORDER

IT IS SO FOUND AND ORDERED, this 27 day of August 2024.



Hon. JEREMY D. PETERSON
United States Magistrate Judge